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Attorneys for Defendants
CITY OF PLEASANTON and
OFFICER RYAN TAJAGUE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

PHILLIP PULLUM,

Plaintiff,

v.

CITY OF PLEASANTON and OFFICER
RYAN TAJAGUE, et al.

Defendants.

Case No. 4:18-cv-00517-YGR

**DECLARATION OF SHEILA D. CRAWFORD IN
SUPPORT OF DEFENDANTS CITY OF
PLEASANTON AND OFFICER RYAN
TAJAGUE'S SUGGESTION OF DEATH UPON
THE RECORD UNDER THE FEDERAL RULES
OF CIVIL PROCEDURE RULE 25(A)(1)**

I, Sheila D. Crawford, declare as follows:

1. I am attorney at law duly licensed to practice law before the courts in the State of California and the Northern District of California. I am a partner of the law firm Bertrand, Fox, Elliot, Osman & Wenzel, attorneys of record for defendants CITY OF PLEASANTON and OFFICER RYAN TAJAGUE in the above-captioned matter. As such, I have personal knowledge of the facts and circumstances surrounding the matter and could, if called, competently testify thereto.

2. I am informed and believe that plaintiff PHILLIP PULLUM (hereinafter "PULLUM")

1 passed away on November 27, 2018.

2 3. Attached hereto as Exhibit A is a true and correct copy of a "Confirmation of Death" of
3 PULLUM by the Alameda County Sheriff's Office.

4 4. Beginning March 11, 2019, I conducted a reasonable investigation as to a legal
5 representative of PULLUM's estate or an appropriate successor upon which to serve notice of
6 defendants' CITY OF PLEASANTON and OFFICER RYAN TAJAGUE'S Suggestion of Death Upon
7 the Record Under the Federal Rules of Civil Procedure Rule 25(a)(1), concurrently filed herewith.

8 5. On June 13, 2018, PULLUM filed a motion for change of address and identified his new
9 address as "4777 Grouse Run Dr. #107, Stockton, California 95207". (Dkt. 12.)

10 6. On March 27, 2019, I sent a letter to 4777 Grouse Run Dr. #107, Stockton, California
11 95207 asking anyone in receipt of the correspondence to contact me at my office number. A true and
12 correct copy of this letter is attached hereto as Exhibit B.

13 7. On April 3, 2019, Linda Teasley-Pearson, plaintiff's mother, called my office. She stated
14 her address is 4777 Grouse Run Drive, Apt. 107, Stockton, CA 95207. As demonstrated in the attached
15 proof of service, defendants served Ms. Teasley-Pearson with a copy of the Suggestion of Death Upon
16 the Record.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
18 true and correct.

19 Executed this 11th day of April 2019 in San Francisco, California.

20 _____
21 /s/ Sheila D. Crawford

22 Sheila D. Crawford
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EXHIBIT A

EXHIBIT A

Alameda County Sheriff's Office

Coroner's Bureau
2901 Peralta Oaks Court, 2nd Floor, Oakland, CA 94605-5319



Gregory J. Ahern, Sheriff

Director of Emergency Services
Coroner - Marshal

February 27, 2019

RE: Confirmation of Death

To Whom It May Concern:

This is to confirm that the Alameda County Sheriff's Office, Coroner's Bureau is investigating the death of ***PULLUM PHILLIP***.

DECEDENT'S NAME:	<u>PULLUM, PHILLIP</u>
CORONER'S CASE NUMBER:	<u>2018-03619</u>
DATE OF DEATH:	<u>11/27/2018</u>
DATE OF BIRTH:	<u>11/26/1979</u>
CAUSE OF DEATH:	<u>GUNSHOT WOUNDS</u>
MANNER OF DEATH:	<u>HOMICIDE</u>

By:

A. Villanueva #211321
Sheriff's Service Cadet
Coroner's Bureau

cc: File

EXHIBIT B

EXHIBIT B

LAW OFFICES OF
BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

A PROFESSIONAL CORPORATION
THE WATERFRONT BUILDING
2749 HYDE STREET
SAN FRANCISCO, CALIFORNIA 94109
Facsimile (415) 353-0990

SENDER'S DIRECT E-MAIL:
scrawford@bfesf.com

SENDER'S DIRECT DIAL:
(415) 353-0999 ext. 110

March 27, 2019

Representative of Phillip Pullum
4777 Grouse Run Dr., #107
Stockton, CA 95207

Re: *Pullum v. Santa Rita Jail, et al.*
USDC Norther District of California, Case No. 4:18-cv-00517-YGR
Our File No. PLE 5796

To Whom it May Concern,

This correspondence concerns the above referenced pending action filed by Phillip Pullum in the Northern District Court of California. My office represents the City of Pleasanton and Officer Ryan Tajague in the above-referend matter.

We understand Mr. Pullum passed away on or around November 27, 2018. If you receive this correspondence, please contact the undersigned at 415-353-0999, ext. 110 to discuss this pending action.

Very truly yours,

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: 
Sheila D. Crawford

SDC/sdc